

008 10:48 7182371393

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/4/08

MEMO ENDORSED

PAUL J. MADDEN
ATTORNEY AND COUNSELOR AT LAW
26 COURT STREET
SUITE 810
BROOKLYN, NEW YORK 11242-1108

TELEPHONE: (718) 624-0964
FACSIMILE: (718) 237-1393

September 2, 2008

Hon. Richard M. Berman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

re: U.S.A. v. Anthony Danna
07 Cr. 1159 [RMB]

Dear Judge Berman:

I am writing respectfully to Your Honor to request an adjournment of the conference which is scheduled for September 3, 2008 until October 1, 2008 at 12:00 p.m. David O'Neil, Esq., the Assistant United States Attorney who represents the Government, consents to and joins in this request. Earlier today I did confer with Mr. O'Neil and also with Ms. Christine Murray, the Deputy Clerk. The above date and time are available to the Court and to the parties, subject to Your Honor's approval. There is a reasonable possibility that there will be a pre-trial disposition by or before that date.

The reason for the request is that additional time will be needed to confer with my client regarding the case and possible disposition and to confer with Mr. O'Neil about a pre-trial disposition. The parties engaged in a safety valve interview last month. The defendant consents to an exclusion of speedy trial time during this period pursuant to 18 U.S.C. } 3161.

Thank you for Your Honor's consideration of this request.

Respectfully yours,

Paul Madden

Paul Madden

Attorney for Mr. Danna

Conference is

adjourned to

10-1-08 at 12:00. Time

is excluded pursuant
to the Speedy Trial Act
for the reasons set forth in this
letter.

SO ORDERED:

Date: 9-4-08

Richard M. Berman
Richard M. Berman, U.S.D.J.

cc: David O'Neil, Esq.

Assistant United States Attorney [by facsimile]

Ms. Margaret Smucz

United States Pre-Trial Services Officer [by e-mail]